

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

MICHELLE CASEY,

Plaintiff,

v.

MONARCH RECOVERY
MANAGEMENT, INC.,

Defendant.

Civil Action No.:

NOTICE OF REMOVAL

TAKE NOTICE THAT, Defendant, Monarch Recovery Management, Inc. (hereinafter “Monarch”) by and through its counsel, Margolis Edelstein, pursuant to 28 U.S.C. § 1441(b) and 28 U.S.C. § 1331, hereby removes the matter captioned as Michelle Casey v. Monarch Recovery Management, Inc. which was filed in the Court of Common Pleas of Luzerne County, Pennsylvania at Civil Action No. 201907956 (“the Action”) to the United States District Court for the Middle District of Pennsylvania. In support thereof, Monarch states as follows:

1. On June 20, 2019 Plaintiff filed the Action in the Court of Common Pleas of Luzerne County, Pennsylvania. A true and correct copy of the Action is attached hereto and marked as Exhibit A.

2. Monarch was placed on notice of the Action when it was served with the Complaint on June 26, 2019.

3. This Notice of Removal is being filed within thirty (30) days that the Action was first removable. See 28 U.S.C. § 1446(b).

4. In the Action Plaintiff has alleged that Monarch violated the Telephone Consumer Protection Act, 47 U.S.C. § 227, et seq., asserting a claim that arises under federal law, whereby this Honorable Court has original jurisdiction under 28 U.S.C. § 1331 and the Action may be removed by Monarch to this Court under 28 U.S.C. § 1441(b).

5. The United States District Court for the Middle District of Pennsylvania should be assigned the Action in the cause of action alleged by Plaintiff arose out of events that occurred in Luzerne County, Pennsylvania.

6. Pursuant to 28 U.S.C. § 1446(d), Monarch will file a copy of this Notice of Removal with the Luzerne County Court of Common Pleas and will serve counsel for Plaintiff with a copy of the Notice of Removal.

WHEREFORE Defendant, Monarch Recovery Management, Inc. notifies this Honorable Court that the Action is to be removed from the Court of Common Pleas of Luzerne County, Pennsylvania to the United States District Court for the Middle District of Pennsylvania pursuant to 28 U.S.C. § 1331 and 28 U.S.C. § 1446.

Respectfully submitted,

MARGOLIS EDELSTEIN

By: /s/ Ronald M. Metcho
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Attorneys for Defendant
Monarch Recovery Management, Inc.

Dated: July 12, 2019

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CERTIFICATE OF SERVICE

I, Ronald M. Metcho, Esq., do hereby certify that a true and correct copy of Defendant, Monarch Recovery Management, Inc.'s Notice of Removal was served upon the below-listed counsel for Plaintiff by U.S. mail and electronic mail on July 12, 2019:

Brett Freeman, Esq.
Sabatini Freeman, LLC
216 N. Blakely Street
Dunmore, PA 18512
brett@bankruptcypa.com

MARGOLIS EDELSTEIN

By: /s/ Ronald M. Metcho
RONALD M. METCHO
Attorneys for Defendant
Monarch Recovery Management, Inc.